

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

RYAN SCOVILLE,

Plaintiff,

v.

UNITED STATES DEPARTMENT STATE,

Defendant.

Case No. 2:22-cv-00091-NJ

JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER

Plaintiff Ryan Scoville and Defendant U.S. Department of State (collectively, the “Parties”) respectfully move for entry of a Protective Order agreed to by the Parties and submitted herewith.

Good cause exists for entry of the Protective Order. *See* Civil L. R. 26(e)(1). This case involves, *inter alia*, allegations that the State Department has an impermissible policy or practice of delay in responding to Freedom of Information Act (“FOIA”) requests under 5 U.S.C. § 552. The Court denied Defendant’s motion to dismiss the policy or practice claim. Discovery on this claim may require Defendant to produce information that it may not produce under the Privacy Act of 1974, 5 U.S.C. § 552a, without a court order. Discovery may also involve proprietary, private, and confidential information of the Parties and proprietary, private, and confidential information concerning non-parties. Entry of the Protective Order is therefore necessary to protect the Parties and non-parties in this litigation.

Agreed to by counsel for the Parties:

On February 9, 2023 for Plaintiff:

By: s/ Brady Williamson

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On February 9, 2023, for the Defendant:

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